

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KATHRYN JORDAN,

Plaintiff,

v.

VERIZON CORPORATION,

Defendant.

Case No. 08-cv-06414

Judge Gerard E. Lynch

**DEFENDANT VERIZON'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

NOW COMES, Verizon Corporation ("Defendant" or "Verizon") by and through its attorneys, Paul, Hastings, Janofsky & Walker, and hereby moves this Court pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure for an extension of time to answer or otherwise respond to Kathryn Jordan's ("Plaintiff" or "Jordan") Complaint. In support thereof, Verizon states as follows:

1. On July 17, 2008, Plaintiff filed a Complaint. Verizon was served with this Complaint on July 18, 2008.
2. Pursuant to Rule 12(a)(1)(A)(i), Verizon currently has until August 7, 2008 to answer or otherwise respond to Plaintiff's Complaint.
3. On July 31, 2008, counsel for Verizon contacted Plaintiff to request a 7-day extension. On August 1, 2008, Plaintiff consented to such an extension.

4. Verizon seeks a 7-day extension to answer or otherwise respond to Plaintiff's Complaint – namely, on or before August 14, 2008.

5. Verizon previously has not requested any extensions in this matter.

6. The parties will not be prejudiced by the proposed extension.

WHEREFORE, for the foregoing reasons, Verizon hereby respectfully requests this Honorable Court to grant it an additional 7 days to answer or otherwise respond to Plaintiff's Complaint, namely, on or by August 14, 2008.

Dated: August 6, 2008

Respectfully submitted,

/s/ Kenneth W. Gage

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Counsel for Defendant
VERIZON CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, I served a true and correct copy of the foregoing **Defendant Verizon's Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint**, via U.S. Postal Service, Certified Mail/Return Receipt, via First Class Mail with postage prepaid on the following:

Ms. Kathryn Jordan
340 Royal Poinciana Way
Palm Beach, Florida 33480

/s/ Kenneth W. Gage

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